

NAVI DHILLON (SBN 279537)  
navidhillon@paulhastings.com  
PETER C. MEIER (SBN 179019)  
petermeier@paulhastings.com  
CHRISTOPHER J. CARR (SBN 184076)  
chriscarr@paulhastings.com  
LUCAS GRUNBAUM (SBN 314180)  
lucasgrunbaum@paulhastings.com  
PAUL HASTINGS LLP  
101 California Street, 48th Floor  
San Francisco, California 94111  
Telephone: (415) 856-7000

HARIKLIA KARIS (*admitted pro hac vice*)  
hkarris@kirkland.com  
ROBERT B. ELLIS (*admitted pro hac vice*)  
rellis@kirkland.com  
MARK J. NOMELLINI (*admitted pro hac vice*)  
mnomellini@kirkland.com  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, IL 60654  
Telephone: (312) 862-2000

Attorneys for Defendant  
PACIFIC BELL TELEPHONE COMPANY

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

CALIFORNIA SPORTFISHING  
PROTECTION ALLIANCE,

Plaintiff,

v.

PACIFIC BELL TELEPHONE  
COMPANY,

Defendant.

CASE NO. 2:21-cv-00073-JDP

**NOTICE OF MOTION TO COMPEL  
COMPLIANCE BY NON-PARTY BELOW  
THE BLUE WITH THE COURT'S ORDERS**

Judge: Hon. Jeremy D. Peterson  
Date: January 25, 2024  
Time: 10:00 a.m.  
Courtroom: 9

Action Filed: January 14, 2021  
Trial Date: None

**TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTE** that on January 25, 2024, at 10:00 a.m., or as soon thereafter as counsel may be heard via Zoom, Pacific Bell Telephone Company (“Pacific Bell”) will and hereby does move for an Order directing Below the Blue (“BtB”) to submit to ESI collection and production by an independent third party for the purpose of identifying and producing responsive materials that BtB was required to produce under this Court’s November 9, 2023 and December 7, 2023 Orders. The Hearing will be conducted via Zoom (Dkt. 95). Contact and other information for the Court and the Courtroom Deputy is available at the following website: <https://www.caed.uscourts.gov/CAEDnew/index.cfm/judges/all-judges/50231/>.

This Motion is based upon the supporting Memorandum of Points and Authorities, the Declaration of Jon David Kelley, all pleadings and materials on file with the Court, and all other matters presented to the Court before the Motion is taken under submission.

Respectfully submitted,

DATED: January 4, 2024

KIRKLAND & ELLIS

By: /s/ Hariklia Karis

HARIKLIA “CARRIE” KARIS

Attorney for Defendant

PACIFIC BELL TELEPHONE COMPANY